



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK:VC
F. #2023R00955

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 2, 2024

By E-Mail and ECF

Allegra Glashausser, Esq.
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One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201
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Re: United States v. Joseph Grunwald
Criminal Docket No. 24-19 (NRM)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's previous disclosure on March 20, 2024 and April 25, 2024. The discovery is being provided to you via USAfx. Please promptly download the material and confirm in writing to the government that you were able to do so. The government also requests reciprocal discovery from the defendant.

The government discloses pursuant to Rule 16(a)(1)(B) a screen recording video of a Telegram conversation between the defendant and the victim described in the indictment (JG_002129), which has been designated "Sensitive" pursuant to the protective order so-ordered by the Court (ECF No. 14).¹ This is the same video referenced on page 2 of the government's March 20, 2024 letter providing discovery (ECF No. 15). The government is preparing a translation of this video and will produce it to defense counsel once it become available.

Please note that at approximately the one minute and five second mark of the video, the government has redacted a sexually explicit image of a minor pursuant to 18 U.S.C.

¹ This letter supersedes a letter previously sent to defense counsel earlier in the day which inaccurately characterized the produced material as disclosed pursuant to Rule 16(a)(1)(A).

§ 3509. You may examine the original version of this video by calling me to arrange a mutually convenient time to review this evidence in a secure location.

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Vincent Chiappini
Vincent Chiappini
Assistant U.S. Attorney
(718) 254-6299

Enclosure

cc: Clerk of the Court (NRM) (without enclosure)